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Attorney for Movant,
Toyota Motor Credit Corporation

**UNITED STATES BANKRUPTCY COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

In re:

Keiri Duenas,

Case No. 2:23-bk-17004-BR

Chapter 7

**STIPULATION TO CONTINUE HEARING
RE: MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

Hearing:

Date: January 30, 2024

Time: 10:00 AM

Place: 1668

255 E Temple Street
Los Angeles, CA 90012

Debtor


**TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY COURT
JUDGE, THE DEBTOR, DEBTOR'S COUNSEL, THE TRUSTEE, AND OTHER INTERESTED
PARTIES:**

The Motion For Relief From The Automatic Stay (the "Motion") was noticed in the within matter and filed by Toyota Motor Credit Corporation ("Movant") as docket entry number 13 in the above-captioned matter. The hearing is scheduled to be held at the date, time, and place set forth above.

Benjamin Heston, attorney for Keiri Duenas ("Debtor"), and Kirsten Martienz, attorney for Movant have conferred and stipulated and hereby declare:

- 1 1. The Motion is to be continued for at least 60 days to allow Debtor to cure the delinquency.
- 2 2. The Stipulation and its Order approving shall in itself serve as proper notice of the continued
- 3 hearing set forth above.
- 4 4. We declare under penalty of perjury that the foregoing is true and correct.

5
6 Dated: 1/29/2024

7 
8 Benjamin Heston
9 Attorney for Debtor,
Keiri Duenas

Dated: 1/29/2024

10 /s/Kirsten Martinez
11 Austin P Nagel
12 Kirsten Martinez
13 Attorney for Movant,
14 Toyota Motor Credit Corporation
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**14841 Dallas Parkway, Suite 350
Dallas, Texas 75254**

A true and correct copy of the foregoing document described as **STIPULATION TO CONTINUE HEARING RE: MOTION FOR RELIEF FROM THE AUTOMATIC STAY** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) January 29, 2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmissions at the email addresses stated below.

U.S. Trustee
ustpregion16.la.ecf@usdoj.gov

Trustee
David M. Goodrich
dgoodrich@go2.law

Debtor's Attorney
Benjamin Heston
bhestonecf@gmail.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) January 29, 2024, I served the following persons and/or entities at the last known address in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

U.S. Bankruptcy Court Judge
Honorable Barry Russell
255 E. Temple Street, Suite 1660
Los Angeles, CA 90012

Debtor
Keiri Duenas
4658 W Imperial Hwy Apt 1
Inglewood, CA 90304

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

January 29, 2024
Date

Corey Banks
Printed Name

/s/ Corey Banks
Signature